



AMANDA + LAWRENCE

+ Via ECF +

June 10, 2025

The Honorable James Donato  
 United States District Judge for the Northern District of California  
 450 Golden Gate Avenue, Courtroom 11, 19th Floor  
 San Francisco, CA 94102

Re: *Klein v. Meta Platforms, Inc.*, Case No. 3:20-cv-08570-JD

Dear Judge Donato:

Plaintiffs briefly respond to Meta's June 6, 2025 letter (Dkt. No. 971). Rather than actually clarifying the record, Meta's uninvited letter simply doubles down on inaccuracies and factual disputes.

As to Meta's first point, its Ex. 1 shows Dr. Williams is correct that Meta's submissions to the FTC made clear that "every single ad on Meta uses their social graph." Specifically, on pages 6-7 of Meta's Ex. 1, Meta represented to the FTC that their "social graph is a representation of *the information on Facebook*." Indeed, Ex. 1 also shows that Dr. Williams is correct, as he testified at the Concurrent Expert Proceeding, that Meta supplemented the information provided by an advertiser using Custom Audience ads with information on Facebook. See Ex. 1 at 3-4. See also Williams Class Reply Report (July 8, 2024) at ¶¶24-33 (discussing Custom Audience ads).

As to Meta's second point, Meta continues to mislead by isolating a single question and answer from Dr. Williams's deposition—a question-and-answer that was part of a series of questions (a series that can be seen in Meta's own exhibit) regarding whether Dr. Williams holds cost and quantity constant in the but-for world in his Yardstick EPR model. See Ex. 2 at 61:9-67:21. In this series, Dr. Williams testified *five* times that his model shows that "if there was a reduction in the quantity of ads sold by Meta in the but-for world, if that reduction in quantity resulted in a corresponding reduction in its costs, that would leave my damages analysis unchanged." See Ex. 2 at 67:16-21; see also slides 9-13 in Dr. Williams's PowerPoint.

Plaintiffs stand by the testimony given by Dr. Williams at the illuminating June 5, 2025 concurrent expert proceedings.

Respectfully submitted,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

/s/ *Amanda Lawrence*

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